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1	BRODY R. WIGHT, ESQ.
2	Nevada Bar No. 13615
	TROUTMAN PEPPER HAMILTON SANDERS LLF
3	8985 S. Eastern Ave., Ste. 200
	Las Vegas, NV 89123 (Nevada Office)
4	Tele: (470) 832-5586
_	Fax: (404) 962-6800
5	brody.wight@troutman.com
6	
U	TROUTMAN PEPPER HAMILTON SANDERS LLF
7	600 Peachtree St. NE #3000
	Atlanta, GA 30308 (Corporate Office)
8	Attorneys for Defendant Nationstar

UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

SFR INVESTMENTS POOL 1, LLC,

Mortgage LLC, dba Mr. Cooper

Case No. 2:22-cv-00534-GMN-NJK

Plaintiff,

VS.

STIPULATION AND ORDER TO EXTEND RESPONSE DEADLINE AND VACATE HEARING

NATIONSTAR MORTGAGE, LLC d/b/a MR. COOPER; FEDERAL NATIONAL MORTGAGE ASSOCIATION; DOES I through X; and ROE BUSINESS ENTITIES I through X, inclusive,

(SECOND REQUEST)

Defendants.

Plaintiff, SFR Investments Pool 1, LLC ("SFR") and Defendants, Nationstar Mortgage, LLC d/b/a Mr. Cooper ("Nationstar") and Federal National Mortgage Association ('Fannie Mae") (collectively, the "Parties"), by and through their undersigned counsel, hereby stipulate and agree to extend briefing deadlines on SFR's Emergency Motion for Temporary Restraining Order and Preliminary Injunction ("Motion") [ECF No. 7, 8]. The Parties further stipulate and agree that the foreclosure sale on the subject property be postponed until this Court rules on SFR's Motion. The parties finally agree to extend the date for Nationstar to file a response to SFR's Complaint. In support of the stipulation, the Parties state as follows:

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- 1. On March 28, 2022, SFR Investments Pool 1, LLC ("SFR") filed the Complaint in the instant matter. [ECF No 1].
- 2. On March 30, 2022, SFR filed an Emergency Motion for Temporary Restraining Order and Preliminary Injunction ("Motion"). [ECF No. 7, 8].
- 3. On April 1, 2022, this Court entered a minute order in chambers setting a deadline for Defendants to respond to the Motion no later than Monday, April 4, 2022 at 5:00 p.m. and further ordering an in person hearing on the Motion for Tuesday, April 5, 2022, at 3:00 p.m. [ECF No. 8].
- 4. On April 4, 2022, this Court entered an order extending the deadline for Nationstar to respond to the motion for preliminary injunction to April 13, 2022, and setting the deadline for SFR to file a reply in support of its motion for April 20, 2022. {ECF No. 12]
- 5. In late March 2022 one of the attorneys for Troutman Pepper representing Nationstar, Aaron Lancaster, left the firm leaving the remaining counsel unable to adequately cover all Nationstar cases assigned to Mr. Lancaster including this matter. On April 11, 2022, attorney Vanessa Turley was hired to represent Nationstar in this and several other matters in Nevada. Ms. Turley needs time to train in her new position, to research this case and SFR's claims, and to respond to the motion for preliminary injunction and the Complaint.
- 6. The Parties agree Defendants shall have until May 4, 2022, to file a response to the Motion for Preliminary injunction, allowing counsel adequate time to evaluate the case and respond to the Motion and to further allow the Motion to be briefed in the normal course pursuant to LR 7-2.
- 7. Pursuant to LR 7-2, SFR shall have seven days after service of Defendant's Response to file a reply in support of its Motion.
- 8. Defendants agree to refrain from setting the foreclosure sale of the real property located at 6171 Fox Creek, Las Vegas, NV 89122, Parcel No. 161-15-212-175

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Case 2:22-cv-00534-GMN-NJK Document 14 Filed 04/15/22 Page 3 of 10

1	until such time as this Court rules on the Motion.	
2	9. Finally, the parties agree that Nationstar shall have until May 4, 2022, to file	
3	response to SFR's Complaint.	
4	10. Both parties represent this stipulation is not made with any intent to delay o	
5	prejudice either party.	
6		
7	DATED this 13 day of April, 2022.	DATED this 13 day of April, 2022.
8	Troutman Pepper Hamilton Sanders LLP	Hanks Law Group
9	/s/Brody R. Wight	/s/ Chantel M. Schimming
10	Brody R. Wight, Esq. Nevada Bar No. 13615	Chantel M. Schimming, Esq. Nevada Bar No. 8886
11	8985 S. Eastern Avenue, Suite 200	7625 Dean Martin Drive, Suite 110
12	Las Vegas, NV 89123 Counsel for Nationstar Mortgage, LLC	Las Vegas, NV 89139 Counsel for SFR Investments Pool 1, LLC
)	dba Mr. Cooper and Federal National	Counsel for SI'K Investments I ooi 1, ELC
13	Mortgage Association	
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17	IT IS SO ORDERED.	
18	Dated this 15 day of April, 2022.	
19		
20		
21	Gloria M. Navarro, District Judge	
22	UNITED STATES DISTRICT COURT	

HANKS LAW GROUP

ATTACHMENT

Duarte, Evelyn S.

From: Chantel Schimming <chantel@hankslg.com>

Sent: Wednesday, April 13, 2022 3:12 PM

To: Wight, Brody R.; Karen Hanks; Turley, Vanessa M.

Cc: Candi Fay; Duarte, Evelyn S.; Clio Maildrop (1387822071; STAFF HANKSLG

Subject: RE: PAGUIA Case 2:22-cv-00534-GMN-NJK SFR Investments Pool 1, LLC v. Nationstar

Mortgage LLC, et al SAO

EXTERNAL SENDER

You may use my e-signature.

Thanks, Chantel

Chantel M. Schimming, Esq. Associate Attorney

HANKS LAW GROUP

7625 Dean Martin Drive, Suite 110 Las Vegas, Nevada 89139 Telephone: (702) 758-8434 Facsimile: (725) 239-3415

mail to: chantel@hankslg.com http://www.hankslg.com

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From: Wight, Brody R. <Brody.Wight@troutman.com>

Sent: Wednesday, April 13, 2022 3:10 PM

To: Chantel Schimming <chantel@hankslg.com>; Karen Hanks <karen@hankslg.com>; Turley, Vanessa M.

<Vanessa.Turley@troutman.com>

Cc: Candi Fay <candi@hankslg.com>; Duarte, Evelyn S. <Evelyn.Duarte@troutman.com>; Clio Maildrop (1387822071 <a27cbe4eb+matter1387822071@maildrop.clio.com>; STAFF HANKSLG <staff@hankslg.com>

Subject: RE: PAGUIA Case 2:22-cv-00534-GMN-NJK SFR Investments Pool 1, LLC v. Nationstar Mortgage LLC, et al SAO

I have attached the proposed SAO. I, of course, kept in the language regarding extending the sale. Let me know if I can attach your signature.

Brody R. Wight Attorney

troutman pepper

Direct: 470.832.5562 | Mobile: 801.645.8978

brody.wight@troutman.com

From: Chantel Schimming <chantel@hankslg.com>

Sent: Wednesday, April 13, 2022 1:15 PM

To: Wight, Brody R. <Brody.Wight@troutman.com>; Karen Hanks <karen@hankslg.com>; Turley, Vanessa M.

<Vanessa.Turley@troutman.com>

Cc: Candi Fay <<u>candi@hankslg.com</u>>; Duarte, Evelyn S. <<u>Evelyn.Duarte@troutman.com</u>>; Clio Maildrop (1387822071

<a27cbe4eb+matter1387822071@maildrop.clio.com>; STAFF HANKSLG <staff@hankslg.com>

Subject: RE: PAGUIA Case 2:22-cv-00534-GMN-NJK SFR Investments Pool 1, LLC v. Nationstar Mortgage LLC, et al SAO

EXTERNAL SENDER

No problem, so long as the sale does not go forward while the MPI is pending and that clause remains in the SAO.

Thank you, Chantel

Chantel M. Schimming, Esq. Associate Attorney

HANKS LAW GROUP

7625 Dean Martin Drive, Suite 110 Las Vegas, Nevada 89139 Telephone: (702) 758-8434 Facsimile: (725) 239-3415

mail to: chantel@hankslg.com http://www.hankslg.com

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From: Wight, Brody R. < Brody. Wight@troutman.com >

Sent: Wednesday, April 13, 2022 12:28 PM

To: Chantel Schimming < chantel@hankslg.com; Karen Hanks < karen@hankslg.com; Turley, Vanessa M.

<Vanessa.Turley@troutman.com>

Case 2:22-cv-00534-GMN-NJK Document 14 Filed 04/15/22 Page 7 of 10

Cc: Candi Fay <<u>candi@hankslg.com</u>>; Duarte, Evelyn S. <<u>Evelyn.Duarte@troutman.com</u>>; Clio Maildrop (1387822071 <a27cbe4eb+matter1387822071@maildrop.clio.com>

Subject: RE: PAGUIA Case 2:22-cv-00534-GMN-NJK SFR Investments Pool 1, LLC v. Nationstar Mortgage LLC, et al SAO

Hi Chantel,

Per our previous stipulation, our opposition to your motion for preliminary injunction is due today. Our new attorney Vanessa Turley started on Monday and has been assigned this case. She needs some time to get trained on our systems and get acquainted and prepare an opposition and our responsive pleading. Would you be willing to stipulate to another extension to file our response and to file a responsive pleading? If possible, I would like to push it out 3 weeks to give Vanessa room. Would that be ok?

Brody R. Wight Attorney

troutman pepper

Direct: 470.832.5562 | Mobile: 801.645.8978

brody.wight@troutman.com

From: Chantel Schimming <chantel@hankslg.com>

Sent: Friday, April 1, 2022 4:15 PM

To: Streible, Elizabeth M. <<u>Elizabeth.Streible@troutman.com</u>>; Karen Hanks <<u>karen@hankslg.com</u>> **Cc:** Candi Fay <candi@hankslg.com>; Balser, Justin D. <Justin.Balser@troutman.com>; Wight, Brody R.

<<u>Brody.Wight@troutman.com</u>>; Duarte, Evelyn S. <<u>Evelyn.Duarte@troutman.com</u>>; Clio Maildrop (1387822071

 $<\!\!\underline{a27cbe4eb+matter1387822071@maildrop.clio.com}\!\!>$

Subject: RE: Activity in Case 2:22-cv-00534-GMN-NJK SFR Investments Pool 1, LLC v. Nationstar Mortgage LLC, et al Minute Order

EXTERNAL SENDER

Elizabeth,

Attached hereto please find the draft SAO for this matter. Also attached for your reference please find the filed pleadings for this case. Karen referenced in her previous email that we had already forwarded them to you, but I believe those were for the other matter, Case No. 2:22-cv-00531-APG-VCF.

Please review the SAO and confirm we may use Brody's e-signature or advise as to recommended changes.

Thank you, Chantel

Chantel M. Schimming, Esq. Associate Attorney

HANKS LAW GROUP

7625 Dean Martin Drive, Suite 110 Las Vegas, Nevada 89139 Telephone: (702) 758-8434

Case 2:22-cv-00534-GMN-NJK Document 14 Filed 04/15/22 Page 8 of 10

Facsimile: (725) 239-3415

mail to: chantel@hankslg.com http://www.hankslg.com

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From: Streible, Elizabeth M. <Elizabeth.Streible@troutman.com>

Sent: Friday, April 1, 2022 2:19 PM
To: Karen Hanks < karen@hankslg.com>

Cc: Candi Fay <<u>candi@hankslg.com</u>>; Chantel Schimming <<u>chantel@hankslg.com</u>>; Balser, Justin D. <<u>Justin.Balser@troutman.com</u>>; Wight, Brody R. <<u>Brody.Wight@troutman.com</u>>; Duarte, Evelyn S.

<Evelyn.Duarte@troutman.com>

Subject: RE: Activity in Case 2:22-cv-00534-GMN-NJK SFR Investments Pool 1, LLC v. Nationstar Mortgage LLC, et al

Minute Order

Thank you for sending! We are still running conflicts but expect to clear on Monday. My NSM contact also confirmed she requested the sale be postponed. Go ahead and send over a SAO and Justin can approve it for Brody's e-signature like he did with the Joint Status Reports.

Elizabeth M. Streible Client Manager Paralegal

troutman pepper Direct: 470.832.5577

elizabeth.streible@troutman.com

From: Karen Hanks <karen@hankslg.com>

Sent: Friday, April 1, 2022 3:15 PM

To: Streible, Elizabeth M. < Elizabeth.Streible@troutman.com>

Cc: Candi Fay <candi@hankslg.com>; Chantel Schimming <chantel@hankslg.com>

Subject: FW: Activity in Case 2:22-cv-00534-GMN-NJK SFR Investments Pool 1, LLC v. Nationstar Mortgage LLC, et al

Minute Order

EXTERNAL SENDER

Elizabeth,

Per the order below, I'm forwarding this to you. We have already forwarded the documents to you. For our other cases with your firm, we have entered into stipulations to hold off on the sale while the injunction motion is heard in the regular course. Please let me know if you want to do that with this case and we'll get an SAO drafted and over to you. If we go this route, then its obviates the need for any of the below.



Karen L. Hanks, Esq. 7625 Dean Martin Drive, Ste 110 Las Vegas, Nevada 89139 702-758-8434 www.hankslg.com

From: cmecf@nvd.uscourts.gov <cmecf@nvd.uscourts.gov>

Sent: Friday, April 1, 2022 1:16 PM **To:** cmecfhelpdesk@nvd.uscourts.gov

Subject: Activity in Case 2:22-cv-00534-GMN-NJK SFR Investments Pool 1, LLC v. Nationstar Mortgage LLC, et al Minute

Order

This is an automatic e-mail message generated by the CM/ECF system. Please DO NOT RESPOND to this e-mail because the mail box is unattended.

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United States District Court

District of Nevada

Notice of Electronic Filing

The following transaction was entered on 4/1/2022 at 1:16 PM PDT and filed on 4/1/2022

Case Name: SFR Investments Pool 1, LLC v. Nationstar Mortgage LLC, et al

Case Number: 2:22-cv-00534-GMN-NJK

Filer:

Document Number: 8(No document attached)

Docket Text:

MINUTE ORDER IN CHAMBERS of the Honorable Judge Gloria M. Navarro on 4/1/2022.

Pending before the Court is the [6] Emergency Motion for Temporary Restraining Order filed by Plaintiff SFR Investments Pool 1, LLC ("Plaintiff"). IT IS HEREBY ORDERED that the Response to the [6] Emergency Motion is due no later than Monday, April 4, 2022, at 5:00 p.m. IT IS FURTHER ORDERED that the Court will conduct an IN PERSON hearing on the [6] Emergency Motion on Tuesday, April 5, 2022, at 3:00 p.m. in Courtroom 7D. IT IS FURTHER ORDERED that Plaintiff's counsel deliver (by email or hand-delivery) this Order and all papers filed in this case to the lawyers they believe represent Defendants Nationstar Mortgage LLC and Federal National Mortgage Association, based on their prior communications, by April 1, 2022, at 4:00 p.m.

(Copies have been distributed pursuant to the NEF - KB)

2:22-cv-00534-GMN-NJK Notice has been electronically mailed to:

Chantel Marie Schimming <u>chantel@hankslg.com</u>, <u>candi@hankslg.com</u>, <u>cschimming@gmail.com</u>, <u>cschimminglaw@yahoo.com</u>, <u>staff@hankslg.com</u>

Karen L. Hanks <u>karen@hankslg.com</u>, <u>candi@hankslg.com</u>, <u>karenleehanks@gmail.com</u>, <u>klund@messner.com</u>, staff@hankslg.com

2:22-cv-00534-GMN-NJK Notice has been delivered by other means to:

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